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Attorney for the United States
Acting Pursuant to 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 23-471 WHO
)	
Plaintiff,)	SUPPLEMENT TO GOVERNMENT'S
)	SENTENCING MEMORANDUM
v.)	
)	
KEITH LATTEI,)	
)	
Defendant.)	

On April 29, 2025, the defendant submitted, under seal, a supplement to his memorandum in support of sentencing containing two letters of support.

To aid the Court in its determination of a sentence sufficient but not greater than necessary to meet the purposes set forth in the sentencing statute, 18 U.S.C. § 3553(a), and mindful of the statutory command that no limits are to be imposed on the information the Court should consider at sentencing, 18 U.S.C. § 3661, the United States hereby submits the attached document.

The attachment is a redacted version of an FBI FD-302 report documenting an interview with the author of Exhibit A to the Supplement to the Defendant's Memorandum. In the interview, the author details the defendant's pattern of harassment against him, his current and former romantic partners, and

1 his family. This harassment included threatening text messages, taking over the author's social media
2 accounts, publicly posting personally identifiable information, including social security numbers, on his
3 website ("doxing"), attempts to shut off utilities at the author's mother's house, and sending hundreds
4 of threatening text messages ("text bombing") to various recipients.

5 DATED: April 30, 2025

Respectfully submitted,

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7 MARTHA BOERSCH
Attorney for the United States
Acting Under Authority Conferred By
8 28 U.S.C. § 515

9 /s/ Nikhil Bhagat
10 NIKHIL BHAGAT
Assistant United States Attorney
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